



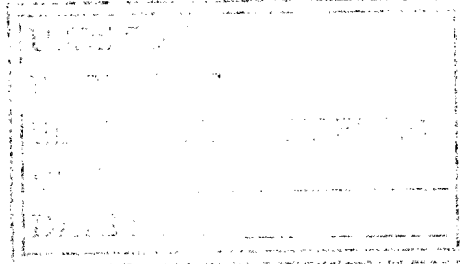
**ALICARE, INC.**  
Third Party Administrators

*An Affiliate of Amalgamated Life*

March 30, 2012

**VIA FACSIMILE (914) 390-4152**

Honorable Kenneth M. Karas  
United States District Judge  
United States District Court  
Southern District of New York  
United States Courthouse  
300 Quarropas Street  
White Plains, New York 10601-4150



**David C. Sapp, Esq.**  
Associate Counsel and  
Director of Litigation

333 Westchester Avenue  
North Building - Second Floor  
White Plains, New York 10601

P: 914-367-5576  
F: 914-367-2576

dsapp@amalgamatedlife.com

Re: Trustees of the UNITE HERE National Retirement Fund -v.- Greenwich Triangle, LLC f/k/a Southwick Clothing LLC -- 09-CV-04962(KMK)

Re: Trustees of the Amalgamated National Health Fund, et al. -v.- Greenwich Triangle, LLC f/k/a Southwick Clothing LLC -- 10-CV-04945 (KMK)

Dear Judge Karas:

We are counsel for the Trustees of the Amalgamated National Health Fund and the Trustees of the National Retirement Fund, plaintiffs in the above-referenced actions. Joined by Paul Galligan, Esq. of Seyfarth Shaw, attorneys for defendant Greenwich Triangle LLC f/k/a Southwick Clothing LLC, we are writing to request that the Court adjourn the case management conference scheduled for April 4, 2012 at 2:00 p.m. to a date at the Court's convenience subsequent to May 4, 2012. We make this request for the following reasons.

The above actions were referred to Magistrate Judge Paul E. Davison for pre-trial matters, including settlement discussions. Magistrate Judge Davison held a conference with counsel on March 28, 2012 in Case No. 09-CV-04962 and requested dates for a settlement conference in mid-April. By letter to Magistrate Judge Davison dated March 30, 2012, the parties requested that a settlement conference be scheduled for April 18, 2012, a date previously suggested by Magistrate Judge Davison. As the parties anticipate that a settlement conference will be scheduled for April 18, the parties respectfully request that the April 4, 2012 conference be adjourned pending the conclusion of the settlement discussions before Magistrate Davison.

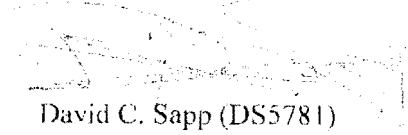
On a related matter, the parties have cooperated in another audit of the books and records of defendant by plaintiff Amalgamated National Health Fund, which has resulted in the issuance of a final revised audit bill on March 5, 2012. Plaintiffs respectfully request the Court's permission to amend the complaint to assert a claim for the audit deficiencies due under the revised audit on or before April 13, 2012. Mr. Galligan has advised the undersigned that defendant consents to the amendment of the complaint.

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Lastly, at the September 13, 2011 conference in Case No. 09-CV-04962, plaintiffs were to submit a proposed order to the Court consolidating Case No. 09-CV-04962 into Case No. 10-CV-04945 after filing their Second Amended Complaint. Plaintiffs inadvertently failed to submit a proposed consolidation order and respectfully request the Court's permission to do so on or before April 6, 2012. //

The Court's considerations are greatly appreciated.

Respectfully submitted,

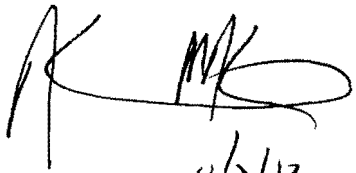
  
David C. Sapp (DS5781)

cc (via facsimile):  
(via e-mail):

United States Magistrate Judge Paul E. Davison  
Paul Galligan, Esq.

All requests are granted. The  
next conference date will be  
May 3, 2012, at 4:15

So ordered.

  
4/2/12